

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

CONDITIONAL MAJOR (DRAFT PERMIT) No. F-04-017

WENDLING PRINTING

NEWPORT KY

JULY 26, 2004

MARK LABHART, REVIEWER

PLANT I.D. # 021-037-00096

APPLICATION LOG # 55985

SOURCE DESCRIPTION:

Wendling Printing operates (5) offset lithographic presses, (1) web press utilizing heatset inks with a natural gas dryer, and (4) sheet fed presses utilizing nonheatset inks. Primary emissions of VOCs are from the use of fountain solutions, ink, and washes. HAPs are emitted from some of the fountain solutions and washes. The source has several plateless printing operations that are insignificant activities, (plateless, e.g. ink jet, laser, xerographic, etc.) and a natural gas fired boiler used for heating purposes.

COMMENTS:

- The source is located in a county classified as nonattainment for the 8 hour ozone standard, however 401 KAR 50:012 is not applicable per Section 1 (1)(c), as source has accepted Federally Enforceable limitations on VOC emissions.
- Emission factors from the offset lithographic presses were determined from the EPA Guideline Series, "Control of Volatile Organic Compound Emissions from Offset Lithographic Printing".
- Emission factors for the natural gas-fired devices were taken from AP-42, 1.4.

EMISSION AND OPERATING CAPS DESCRIPTION:

Operating limitations shall be, VOC emissions no more than 30 TPY, single HAP emissions no more than 9.0 TPY and total HAP emissions no more than 22.5 TPY.

PERIODIC MONITORING:

The source will submit semi-annual reports of calculated emissions based on material balance to show compliance with Conditional Major limitations.

OPERATIONAL FLEXIBILITY:

Wendling Printing is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

CREDIBLE EVIDENCE:

This permit contains provisions, which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.